

Letter of Appeal  
Before the Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Received & Inspected  
AUG 19 2011  
FCC Mail Room

In the matter of:

Appeal of the decision on	)	
Implementation Extension Request of	)	Jackson Public School District
Application 636392 received after the	)	Daniel Littleton, Erate Adm.
FCC deadline for Implementation	)	662 South President Street
Deadline Extension request which was	)	Jackson, Mississippi 39201
September 30, 2010. Administrator	)	Fax Number: 601-960-8860
Decision Dated June 21, 2011, Denied	)	Email: dalittleton@jackson.k12.ms.us
in full.	)	
	)	CC-Docket No. 02-6
Jackson Public School District,	)	CC-Docket No. 96-45
	)	
ComWeb Technology Group, Inc	)	
	)	
Ben: 128645 Spin: 143005079	)	
	)	
Form 471: 636392 FRN: 1761537	)	

Letter of Appeal

Request for Review of Administrator's Decision Dated June 21, 2011

COMES NOW, the Jackson Public School District (hereinafter "JPSPD"), located in Jackson, Mississippi, and files this its Letter of Appeal before the Federal Communications Commission (hereinafter "FCC") appealing the Administrator's Decision on Implementation Extension Request Letter for the above-referenced application number. This appeal involves the purchase of the COMWEB (KWS) equipment and an implementation deadline extension to complete the installation process on Application 636392 FRN 1761537. In support of its appeal, JPSPD would show the following to-wit:

I. STATEMENT OF FACTS

On January 8, 2008, JPS filed Form 470: 876370000660402 seeking COMWEB (KWS) equivalent classroom switches to include all necessary components, cables, installation, delivery, warranty, and support; 1 lab per schools with each having 31 workstations. (See Attachment 1, Form 470 (876370000660402) Filing the Form 470 would make the resulting contract eligible for e-rate

No. of Copies rec'd 0  
List ABCDE

funding. On January 21, 2008, COMWEB provided a COMWEB Sole Source Letter (See Attachment 3). Subsequently, JPS subsequently filed a Form 471: 636392 using COMWEB SPIN: 143005079. The original requested amount was \$630,000 but was later reduced to \$540,281.70 during Program Integrity Assurance (PIA) review. The purpose of the reduction was to remove products and services that PIA determined were ineligible for e-rate support.

On or about February 6, 2009, the undersigned notified USAC in writing that JPS wished to cancel 471: 636392 due to the change in leadership of JPS' information technology director. The COMWEB project actually began under the supervision of Mr. Gavin Guynes, who was the technology director at that time. Mr. Philip Hairston succeeded Mr. Guynes as director. Mr. Hairston wanted to review the COMWEB anticipated purchase to ensure it met JPS' needs before supporting its 471 request. On March 3, 2009, USAC issued a Funding Commitment Decision Letter (FCDL) due to the cancellation of the request in consultation with the applicant. (See Attachment A1.) However, JPS later decided to appeal the FCDL and sought to reverse its cancellation of Form 471 Application 636392 FRN 1761537.

## II. ARGUMENT

### A. JPS Experienced a Change in Leadership in its Information Technology Department.

The COMWEB project actually began under the supervision of Mr. Gavin Guynes, who was the technology director in 2008. In 2009, Mr. Philip Hairston succeeded Mr. Guynes as director. Mr. Hairston wanted to review the COMWEB anticipated purchase to ensure it met JPS' needs before supporting its 471 request. On March 3, 2009, USAC issued a Funding Commitment Decision Letter (FCDL) due to the cancellation of the request in consultation with the applicant. (See Attachment A1.) However, JPS later decided to appeal the FCDL and sought to reverse its cancellation of Form 471 Application 636392 FRN 1761537.

B. The PIA Review Process Raised Concerns about the Product's Eligibility for E-rate Funding.

Another reason for the delay in the project's implementation date of September 30, 2010 was the questions about the product's true eligibility for e-rate funding that were raised during the PIA review process. On May 27, 2009, USAC issued a letter requesting further clarification and documentation in order to resolve the eligibility of some of the items. (See Attachment 3.) When these questions were raised, JPS became concerned about failing an audit which would necessitate a commitment adjustment. Therefore, JPS reevaluated the project and analyzed e-rate funding in order to ascertain whether the equipment would ultimately pass a subsequent audit. Its analysis of other applicants for the same service demonstrated that USAC may question the eligibility of COMWEB's Knowledge Web System. Ultimately, the 471 application (636392) passed PIA review and JPS was issued a FCDL dated March 3, 2009. The last date to invoice was January 28, 2011. Additionally, JPS had protracted dialogue with COMWEB regarding the purchase.

The analysis conducted by JPS is shown below:

Comweb Recap: Funding Years 2005 - 2010

SPIN: 143005079

Funding Year	FRN Count	FRNs Funded	FRNs Not Funded	FRNs with no Action	Total Amt Requested	Total Amt Funded	Total Amt Disbursed
2005	23	15	8	0	\$3,187,026.10	\$1,563,433.00	\$1,221,385.00
2006	32	3	5	24	\$5,838,181.18	\$182,250.00	\$182,250.00
2007	4	0	1	3	\$89,302.64	\$0.00	\$0.00
2008	8	1	2	5	\$788,147.29	\$475,447.90	\$0.00
2009	5	0	0	5	\$88,585.81	\$0.00	\$0.00
2010	3	0	0	0	\$233,640.07	\$0.00	\$0.00

Totals	75	19	16	37	\$10,224,883.09	\$2,221,130.90	\$1,403,635.00
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(Source: USAC's Data Retrieval Tool,  
<http://www.usac.org/sl/tools/search-tools/data-retrieval-tool.aspx>)

An analysis of the data shows the following:

1. Since Funding Year 2005, applicants have filed 52 FRNs, including Funding Year 2010. It is too early for any decision to be reached on

the 2010 FRNs. Left are 49 FRNs of concern, with four of them funded, eight denied, and 37 have received neither a funding nor a denial decision.

2. When USAC has denied eight FRNs and cannot reach a decision on an additional 37 FRNs, it appears that USAC has a concern.
3. Of the 19 FRNs that have been funded, two were reduced to remove ineligible services.
4. Of the 16 FRNs that have been denied, seven were denied because of ineligible products/services.
5. One FRN was denied because of ineligible use.
6. One FRN was denied after consultation with the applicant.
7. One FRN was denied without giving a reason.
8. The four FRNs that have been funded since 2005 have all been from Mississippi applicants (Canton and JPS).

### III. Conclusion

JPS respectfully requests a reversal of the Administrator's Decision and an implementation deadline extension from September 30, 2010, in order to complete the installation process. JPS' implementation delay was due to the change in leadership in the technology department, the time needed for careful re-evaluation, and the concerns about the eligibility of the COMWEB (KWS) equivalent classroom switches. Therefore, the evaluation process created circumstances beyond the service provider's control.

This the 18th day of August, 2011.

Respectfully submitted,

Daniel Littleton

A handwritten signature in cursive script that reads "Daniel Littleton".

E-Rate Administrator



A-1

**Littleton, Daniel**

---

**From:** Guynes, Gavin  
**Sent:** Wednesday, January 09, 2008 7:40 AM  
**To:** Littleton, Daniel; Donaldson, Priscilla  
**Subject:** FW: PROD : Form Certified using PIN  
**Importance:** High

Received & Inspected

AUG 19 2011

FCC Mail Room

FYI

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**From:** sldnoreply@sl.universalservice.org [mailto:sldnoreply@sl.universalservice.org]  
**Sent:** Tue 1/8/2008 4:04 PM  
**To:** Guynes, Gavin  
**Subject:** PROD : Form Certified using PIN

This is to notify you that the Form 470 # ending in 660402 has been e-Certified using your PIN . DO NOT REPLY TO THIS E-MAIL. THIS EMAIL BOX IS UNMONITORED. IF YOU HAVE ANY QUESTIONS CALL THE CLIENT SERVICE BUREAU AT 888-203-8100.

01/14/2009

# FCC Form 470

Universal Service Program Description of Services Requested and Certification Form



Entity Number: 128645

Contact Person: MR. GAVIN GUYNES

Applicant's Form Identifier: JPS-IC-08

Phone Number: (601)960-8835

FCC Form

Approval by OMB  
3060-0806

Do not write in this area

470

## Schools and Libraries Universal Service Program Description of Services Requested and Certification Form

Form 470 Application Number: 876370000660402

19. ☒ I certify that the applicant includes: (Check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges and universities).

20. ☒ I certify that all of the individual schools, libraries, and library consortia receiving services under this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, an SLD-certified technology plan approver, prior to the commencement of service. The plans were written at the following level(s):

- a. ☐ individual technology plans for using the services requested in the application; and/or
- b. ☒ higher-level technology plans for using the services requested in the application; or
- c. ☐ no technology plan needed; application requests basic local, cellular, PCS and/or long distance telephone service and/or voice mail only.

21. ☒ I certify that I will post my Form 470 and (if applicable) make my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology plan goals. I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools, and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

22. ☒ I certify that the services the applicant purchases at discounts provided by U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec.



54.500(k). Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

23. ☒ I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the service purchased effectively. I recognize that some of the aforementioned resources are not eligible for support.

24. ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25. ☒ I certify that I have reviewed all applicable state and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form can be punished by the fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

26. ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.

27. Cert ID = 231255	28. Date 1/8/2008
29. Printed name of authorized person GAVIN GUYNES	
30. Title or position of authorized person DIRECTOR OF INFORMATION TECHNOLOGY	
31a. Street Address, P.O Box or Route Number 662 SOUTH PRESIDENT STREET JACKSON, MS 39201	
31b. Telephone number of authorized person: (601) 960-8835	
31c. Fax number of authorized person: (601) 960-8860	
31d. E-mail of authorized person: GGYNES@JACKSON.K12.MS.US	
31e. Name of authorized person's employer: JACKSON PUBLIC SCHOOL DISTRICT	
<p><b>ATTENTION: If you are signing Form 470 using the PIN assigned to you by SLD, you are reminded that using the PIN is equivalent to your handwritten signature on the form. Your use of the PIN to affirm these certifications means that should they prove untrue, you will be held to the same enforcement standards as those who affirm the certifications on paper. Also, by using the PIN, you are affirming that you have the authority to make these certifications and represent the entity featured in Block One of this funding request.</b></p>	
Please Check to affirm your compliance <input checked="" type="checkbox"/>	

Form 470 Application Number:  
JACKSON PUBLIC SCHOOL DISTRICT  
662 S PRESIDENT ST  
JACKSON, MS 39201-

Service provider involvement with preparation or certification of a Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the SLD web site at [www.sl.universalservice.org](http://www.sl.universalservice.org) or call the SLD Client Service Bureau at 1-888-203-8100.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1996, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Done





Universal Service Administrative Company

**Schools and Libraries Division**

1/14/2009

**Daniel Littleton**  
**JACKSON PUBLIC SCHOOL DISTRICT**  
**(601) 9608835**  
**Application Number 636392**

**Response Due Date:** January 29<sup>th</sup>, 2009

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2008 Form 471 Applications for schools and libraries discounts to ensure that they are in compliance with the rules of the Universal Service program. We are currently in the process of reviewing your Funding Year 2008 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

**Application 636392**

1. On your original FY2008 Form 471 application # **636392**, Form 470 # 876370000660402 is referenced as the establishing Form 470 on FRN **1761537**. Our records do not include a signed Certification page for this Form 470.

Is this the establishing Form 470 for this FRN?

☐ **No.** If No, please provide the 15-digit Form 470 Number that did establish the bidding for the various FRN. The establishing Form 470 is the specific Form 470, which was posted for that particular service for 28 days, and pursuant to which a contract was signed or an agreement was entered into. The establishing Form 470 could have been posted by the State, if the requested services are being purchased off of a State Master Contract.

☒ **Yes**

You have submitted the Form 470 certification proceed to Option I.

You have NOT submitted the Form 470 certification proceed to Option II.

**Option I**

If the cited Form 470 certification was postmarked on or before the close of the filing window on February 07, 2008, please provide proof of mailing, such as a certified mail receipt, delivery tracking documentation, online certification confirmation page, or other equivalent documentation supporting your claim, and a copy of the original Form 470 certification page.

If your Form 470 Certification was submitted with other documents or Forms in the same envelope, please indicate what documents or Forms were submitted together. Please indicate the Form type (Form 471, Form 486, etc.) and application number if known.

Please refer to the Proof of Postmark or Delivery document available in the reference area of the SLD website <http://www.usac.org/sl/about/document-retention-requirements/proof-postmark.aspx> for questions regarding the documentation required.

**Option II**

1. If Yes, and you are the authorized person on the Form 470, please complete and sign a Form 470 Certification page for this Form 470 and provide to me. Failure to provide a copy of the signed Form 470 Certification page will result in a denial of your funding request.

2. If Yes, and you are not the authorized person on the Form 470, please provide to me a Form 470 Certification page from the Form 470 signed by the authorized person. Failure to provide a copy of the signed Form 470 Certification page will result in a denial of your funding request.

**Please fax or email the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.**

**It is important that we receive all of the information requested within 15 calendar days so we can complete our review. Failure to respond may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Should you wish to cancel your Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

**Thank you for your cooperation and continued support of the Universal Service Program.**

**Garima Warma**

**Program Integrity Assurance**

**USAC, Schools and Libraries Division**

**Phone: 973- 581-5352**

**FAX: 973- 599- 6513**

**E-mail address [Gwarma@sl.universalservice.org](mailto:Gwarma@sl.universalservice.org)**



## Littleton, Daniel

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**From:** Warma, Garima [GWARMA@sl.universalservice.org]  
**Sent:** Tuesday, February 03, 2009 10:13 AM  
**To:** Littleton, Daniel  
**Subject:** RE: Application 636392

Daniel,

You want to cancel 471 application 636392? Please clarify.  
Thanks  
Garima

-----Original Message-----

From: Littleton, Daniel [mailto:dalittleton@jackson.k12.ms.us]  
Sent: Tuesday, February 03, 2009 11:10 AM  
To: Warma, Garima  
Subject: RE: Application 636392

Good Morning Garima,

I have been instructed to cancel the 470. How do I accomplish this at this point?

Thanks  
Daniel Littleton

-----Original Message-----

From: Warma, Garima [mailto:GWARMA@sl.universalservice.org]  
Sent: Monday, February 02, 2009 8:36 AM  
To: Littleton, Daniel  
Subject: RE: Application 636392

Morning Daniel,

As we know that Mr. Gavin Guynes is no longer working with JACKSON PUBLIC SCHOOL DISTRICT. The form 470 question that was sent to you previously requesting for the signature. Can you please get a school official to sign the form 470 (such as the Principal, Vice Principal, Superintendent) can sign the 470 for App 636392.  
FYI: the remaining 3 applications are still in works and I will update you with the status once the review is completed.

Please do let me know if you have any questions regarding 470 questions. You could reach me at 973-581-5352.

Thanks  
Garima Warma

-----Original Message-----

From: Littleton, Daniel [mailto:dalittleton@jackson.k12.ms.us]  
Sent: Wednesday, January 28, 2009 3:39 PM  
To: Warma, Garima  
Subject: RE:

Warma,

I am just doing a followup on the Form 470 application number 636392.  
What is the status

-----Original Message-----

From: Warma, Garima [mailto:GWARMA@sl.universalservice.org]



Sent: Thursday, January 15, 2009 6:47 AM  
To: Littleton, Daniel  
Subject: RE:

Morning Daniel,

Thank you for your quick response. I just need you to get Mr. Gavin Guynes signature on the Form 470 where it says print the name of the authorized person. Right by his name just ask him to sign it.

Thanks  
Garima

-----Original Message-----

From: Littleton, Daniel [mailto:dalittleton@jackson.k12.ms.us]  
Sent: Wednesday, January 14, 2009 5:04 PM  
To: Warma, Garima  
Subject: FW:

Hello Garima,

The attacheded PDF should answer your question concerning the 470 certification page.

Thanks,

Daniel

-----Original Message-----

From: LITTLETON, DANIEL [mailto:dalittleton@jackson.k12.ms.us]  
Sent: Wednesday, January 14, 2009 3:57 PM  
To: Littleton, Daniel  
Subject:

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

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Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is STRICTLY PROHIBITED. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

**Littleton, Daniel**

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**From:** Warma, Garima [GWARMA@sl.universalservice.org]  
**Sent:** Thursday, January 15, 2009 6:47 AM  
**To:** Littleton, Daniel  
**Subject:** RE:

Morning Daniel,  
Thank you for your quick response. I just need you to get Mr. Gavin Guynes signature on the Form 470 where it says print the name of the authorized person. Right by his name just ask him to sign it.  
Thanks  
Garima

-----Original Message-----

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**Sent:** Wednesday, January 14, 2009 5:04 PM  
**To:** Warma, Garima  
**Subject:** FW:

Hello Garima,

The attacheded PDF should answer your question concerning the 470 certification page.

Thanks,

Daniel

-----Original Message-----

**From:** LITTLETON, DANIEL [mailto:dalittleton@jackson.k12.ms.us]  
**Sent:** Wednesday, January 14, 2009 3:57 PM  
**To:** Littleton, Daniel  
**Subject:**

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

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Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is STRICTLY PROHIBITED. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

Gavin Guynes  
117 4<sup>th</sup> Street  
Flora, MS 39071  
January 15, 2009

Daniel Littleton  
E-Rate Coordinator  
Jackson Public Schools  
662 S. President Street  
Jackson, MS 39201

Dear Mr. Littleton:

On January 8, 2008 I submitted and certified form 470# 876370000660402 online. This online certification was my signature and the cert ID is 231255. The certification occurred immediately after the submission of the 470 online, January 8, 2008.

Since I no longer work for the district in any official capacity, I feel that it would be remiss of me to sign the paper 470 that was requested during the PIA process. I sincerely hope that the Schools and Libraries division of USAC will accept this letter as proof that the 470 in question was in fact certified as required. I would also like to point out that if I was still employed with the district, I could sign the document with no hesitation.

If PIA refuses to accept this document as proof that the 470 was submitted and certified, please let me know.

Sincerely,



Gavin Guynes  
Director, IT  
Madison County Schools

CC: Paul Stankus  
CC: Patricia Dalton  
CC: Garima Warma



**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2008: 07/01/2008 - 06/30/2009)

March 3, 2009

Daniel Littleton  
JACKSON PUBLIC SCHOOL DISTRICT  
662 S PRESIDENT ST  
JACKSON, MS 39201

Re: Form 471 Application Number: 636392  
Billed Entity Number (BEN): 128645  
Billed Entity FCC RN: 0012269486  
Applicant's Form Identifier: 471-COMWEB-08

Thank you for your Funding Year 2008 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

**NEXT STEPS**

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity applicant) - as products and services are being delivered and billed

**TO APPEAL THIS DECISION:**

You have the option of filing an appeal with the SLD or directly with the Federal Communications Commission (FCC).

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
  - Appellant name,
  - Applicant name and service provider name, if different from appellant,
  - Applicant BEN and Service Provider Identification Number (SPIN),
  - Form 471 Application Number 636392 as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2008," AND
  - The exact text or the decision that you are appealing.



=====

FUNDING COMMITMENT REPORT  
Billed Entity Name: JACKSON PUBLIC SCHOOL DISTRICT  
BEN: 128645  
Funding Year: 2008

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 636392  
Funding Request Number: 1761537  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 876370000660402  
SPIN: 143005079  
Service Provider Name: Comweb Technology Group, Inc.  
Contract Number: N/A  
Billing Account Number: N/A  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2008  
Service End Date: N/A  
Contract Award Date: 02/05/2008  
Contract Expiration Date: 06/30/2009  
Shared Worksheet Number: 1024563  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$630,000.00  
Pre-discount Amount: \$630,000.00  
Discount Percentage Approved by the USAC: 88%  
Funding Commitment Decision: \$0.00 - Applicant request  
Funding Commitment Decision Explanation: FRN canceled in consultation with the applicant.

FCDL Date: 03/03/2009

Wave Number: 041

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2010

## Fax Call Report

Page 1

## Fax Header Information

ITS  
6019608860  
2009-Feb-06 03:27 PM

Job	Date/Time	Type	Identification	Duration	Pages	Result
2820	2009-Feb-06 03:26 PM	Send	919735996513	0:48	2	Success



Office of Information Technology

February 6, 2009

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

**Fax**

To: Gatina Warma  
Schools and Libraries Division  
Program Integrity Assurance  
Phone: 973- 581-5352  
FAX: 973- 599-6513  
[Gwarma@sl.universalservice.org](mailto:Gwarma@sl.universalservice.org)

From: Mr. Daniel Littleton  
Erate Administrator

Fax: 973-599-6513

Pages: 2

Phone:

Date: 02/06/2009

Re: 471 Application 636324 636392 636180

CC:

☒ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply Please

NOTE:





Office of Information Technology

February 6, 2009

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

# Fax

**To:** Garima Warma  
Schools and Libraries Division  
Program Integrity Assurance  
Phone: 973- 581-5352  
FAX: 973- 599-6513  
[Gwarma@sl.universalservice.org](mailto:Gwarma@sl.universalservice.org)

**From:** Mr. Daniel Littleton  
Erate Administrator

**Fax:** 973-599-6513

**Pages:** 2

**Phone:**

**Date:** 02/06/2009

**Re:** 471 Application 636324 636392 636180

**CC:**

☒ **Urgent**    ☐ **For Review**    ☐ **Please Comment**    ☐ **Please Reply**    **Please**

NOTE:



Office of Information Technology

---

February 6, 2009

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

Garima Warma  
Schools and Libraries Division  
Program Integrity Assurance  
Phone: 973- 581-5352  
FAX: 973- 599-6513  
E-mail address [Gwarma@sl.universalservice.org](mailto:Gwarma@sl.universalservice.org)  
471 Application 636324 636392 636180

Dear Mrs. Warma,  
Please accept this letter of authorization to cancel 471 Application 636324, 636392 and 636180.

Sincerely,

Daniel Littleton,  
Erate Administrator



**Office of Information Technology**

---

**April 20, 2009**

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

Letter of Appeal  
Schools and Libraries Division – correspondence  
100 South Jefferson Road  
P. O. Box 902  
Whippany, NJ 07981

**Entity Number: 128645 - Jackson Public School District**

**Spin Number: 14305079 – Comweb Technology Group, Inc**

**Application: 636392 FRN: 1761537**

**Letter of Appeal**

**Documentation Support**

**Copy of FCDL**



Before the Schools and Libraries Division  
Correspondence Unit  
Whippany, NJ 07981

**In the matter of:**

Request to reverse a request for	)	
cancellation of Application 636392	)	Administrator Decision Dated
	)	March 3, 2009
from Jackson Public School District,	)	
Entity number 128645, 662 South	)	Application 636392 FRN 1761537
President Street, Jackson,	)	
Mississippi 39201	)	
School and Libraries Division -	)	
Correspondence Unit	)	

**Letter of Appeal**  
**Cancellation Reversal of application 636392**

In accordance with the funding Commitment Decision Letter received March 3, 2008, now comes Jackson Public School district, Jackson, Mississippi before the Schools and Libraries Division requesting a reversal of a decision made by Jackson Public School District to cancel application 636392 FRN 1761537. This request comes before the Schools and Libraries Division in a timely manner from the Administrator decision dated March 3, 2009 due to consultation with Administrator and request by Jackson Public School District.

**Background**

Jackson Public School District filed an E-Rate discount application on February 7, 2008 for internal connection equipment and installation to be delivered in E-rate Year 2008. The equipment and installation requested had a total cost of \$630,000.00. Based on the 88 percent discount for Jackson Public School District, the total funding request was \$554,400.00.

On January 15<sup>th</sup>, 2009, Mrs. Garima Warma (SLD) during the program integrity assurance review requested a signature on the Form 470 application number

876370000660402 from Mr. Gavin Guynes, Director of Information Technology at the time. I, Daniel Littleton, E-Rate Administrator responded the same day to Mrs. Garima Warma with the online certification copy of the Form 470 certified online (cert id 231255). Mrs. Warma further requested Mr. Gavin Guynes signature on the already online certified Form 470. I have attached a copy of Mr. Gavin Guynes response to Mrs. Garima Warma request for signature and a copy of the Form 470. Mr. Gavin Guynes no longer worked for the School District and was advised to not sign Form 470 due to possible legalities. After deliberation with Current Director, Mr. Philip Hairston and upper management, a decision was made to cancel 471 application 636392 FRN 1761537. This decision was made based on two reasons: 1) Mr. Gavin Guynes would not sign the 470. 2) Mr. Philip Hairston, Mr. Gavin Guynes replacement could not adequately support the 471 request without the privilege of reviewing the 471 request, Comweb equipment and installation proposal.

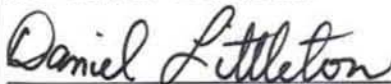
#### Conclusion

Since the time Jackson Public School District made the request to cancel the 471 application 636392, Mr. Philip Hairston, the new Director of Information technology, along with myself, Mr. Daniel Littleton, E-Rate Administrator have had the opportunity to re-examine the Comweb equipment, installation and services proposed. We have conclude that the Form 471 636392 for the COMWEB KWS Classroom Switch is a much needed system for our students.

Therefore, we are requesting the Schools and Libraries Division to accept our request to reverse the requested cancellation of Form 471 application 636392 FRN 1761537.

Respectfully submitted this 20<sup>th</sup> day of April, 2009

Mr. Daniel Littleton



E-Rate Administrator





**Revised Funding Commitment Decision Letter  
Funding Year 2008: (07/01/2008 - 06/30/2009)**

November 3, 2009

Daniel Littleton  
JACKSON PUBLIC SCHOOL DISTRICT  
662 S PRESIDENT ST  
JACKSON, MS 39201

RE: Form 471 Application Number: 636392  
Billed Entity Number: 128645  
Applicant's Form Identifier: 471-COMWEB-08

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has completed its review of your request.

The Report that follows this Revised Funding Commitment Decision Letter (RFCDL) provides you with the dollar value and other details of the funding commitments made for the Form 471 identified above. This Report may have been updated to reflect the new total amount of discount for a funding request. A decision in this Revised Funding Commitment Decision Letter (RFCDL) supersedes a decision in the FCDL you may have received for the Funding Request Number(s) (FRN) in the Funding Commitment Report (Report) that follows this letter. An explanation of the items in the Report is in the "Guide to USAC Letter Reports" posted in the Reference Area of our website.

If FCC Form 486, Receipt of Service Confirmation Form, has not already been submitted, applicants should use THIS updated information when completing the Form 486.

We are also sending this information to the service provider(s) identified in the Report.

**NEXT STEPS**

- Work with your service provider(s) to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File and certify Form(s) 486 if not already submitted
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity applicant) - as products and services are being delivered and billed

**IMPLEMENTATION TIMEFRAME**

Remember the deadlines for delivery and installation of non-recurring service. Non-recurring service for which funds are committed in this letter may be delivered and installed on or before September 30, 2010. Support for recurring services, however, is available only for services provided during the period July 01, 2008 through June 30, 2009.

Review any Contract Expiration Dates in the attached Report. Program rules allow contracts for non-recurring services to be extended in certain circumstances. If your contract will expire before non-recurring products/services are delivered or



FUNDING COMMITMENT REPORT  
Billed Entity Name: JACKSON PUBLIC SCHOOL DISTRICT  
BEN: 128645  
Funding Year: 2008

Form 471 Application Number: 636392  
Funding Request Number: 1761537  
Funding Status: Funded  
Category of Service: INTERNAL CONNECTIONS  
Form 470 Application Number: 876370000660402  
SPIN: 143005079  
Service Provider Name: Comweb Technology Group, Inc.  
Contract Number: N/A  
Billing Account Number: N/A  
Service Start Date: 07/01/2008  
Contract Expiration Date: 06/30/2009  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$540,281.70  
Pre-discount Amount: \$540,281.70  
Discount Percentage Approved by the SLD: 88%  
Funding Commitment Decision: \$475,447.90 - Modified by SLD  
Funding Commitment Decision Explanation: MR1: The dollars requested were reduced to remove: the ineligible product(s)/service(s): Desktop Switch Control Devices and its associated technical training, shipping, handling, insurance, coordinated delivery, installation and project management cost. <><><><><> MR2: The 470 cited did not include Basic Maintenance of Internal Connections; therefore it does not meet the 28 day competitive bidding requirement. <><><><><> MR3: The FRN was modified from \$630,000.00 to \$540,281.70 (pre-discount) to agree with the applicant documentation.  
Revised FCDL Date: 11/03/2009  
Appeal Wave Number: A15  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2010

MR1 - 640737

S. Code - 20155

# USAC

Schools and Libraries Division  
Correspondence Unit  
100 South Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981

## **TIME SENSITIVE MATERIAL**

00002  
Daniel Littleton  
JACKSON PUBLIC SCHOOL DISTRICT  
662 S PRESIDENT ST  
JACKSON, MS 39201



A-3



Office of Information Technology

Received & Inspected

AUG 19 2011

PCG Mail Room

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

June 19<sup>th</sup>, 2009

**QUESTIONS:**

1. **The Desktop Switch Control Devices (MDL-291VPS) – are they installed on workstations? If not, where are they installed? Provide a detailed description of function(s).**

**ANSWER:** The Desktop Switch Control Devices (MDL-291VPS) are not installed on workstations. They connect via a short wire to the local System Switch Boxes (MDL-295VPS). They function as dedicated hardware switches on the user desktops. They allow the users on an as needed basis to push a button to send a signal that: (1) activates the Main System Controller (MCC-390TPS); and (2) causes the Main System Controller to transmit Internet and other networked resources to the user desktops.

2. **The Standard Cable Sets (MCC-CABLE) – are they installed on workstations? If not, where are they installed, and what equipment is being connected to that equipment?**

**ANSWER:** The Standard Cable Sets (MCC-CABLE) include: (1) Bus Cables and (2) Interface Cables. The Bus Cables within the Standard Cable Set (MCC-CABLE) are not installed on workstations. They are installed either between the Main System Controller (MCC-390TPS) and the local System Switch Boxes (MDL-295VPS) or they are installed between any two local System Switch Boxes (MDL-295VPS). The keyboard, mouse, and/or monitor Interface Cables within the Standard Cable Set (MCC-CABLE) are installed between the local System Switch Box (MCC-295VPS) and the monitor, keyboard, mouse and workstation components on an as needed basis. A local workstation is not required.



3. The System Switch Boxes (MDL-295VPS) – are they installed on workstations? If not, where are they installed? Provide a detailed description of the function(s).

**ANSWER:** The System Switch Boxes (MDL-295VPS) are not installed on workstations. They are installed either directly on the Main System Controller (MCC-390TPS) using the System Bus Cables (MCC-CABLE) or they are installed in a daisy-chain topography with other System Switch Boxes (MDL-295VPS) using the System Bus Cables (MCC-CABLE). The MDL-295VPS System Switch Boxes function as local switches that communicate in two directions with the Main System Controller (MCC-390TPS) to send and receive Internet and other networked resources. Each MDL-295VPS System Switch Box is assigned a unique network address and the Main System Controller is then able to selectively distribute Internet and other network resources to the designated local MDL-295VPS boxes only.

4. The Instructor System Control Panels (MCC-390KC) – are they installed on teacher workstations? If not, where are they installed? Provide a detailed description of function(s).

**ANSWER:** The Instructor System Control Panel (MCC-390KC) is not installed on the teacher workstation. It connects to the COMWEB Main System Controller (MCC-390TPS) via its own short cable. The MCC-390KC performs the following functions: (1) it sends commands to the Main System Controller (MCC-390TPS) that activate the MCC-390TPS and cause it to send and receive Internet and other networked resources via the MDL-295VPS boxes; (2) optionally, it can also send commands to the Main System Controller (MCC-390TPS) that dynamically add or remove individual MDL-295VPS boxes from the current transmission; (3) it sends commands to the MDL-291VPS Desktop Switch Control Devices that turns the function of the MDL-291VPS button on and off; and (4) it allows the user to enter a special command to temporarily disable the Instructor System Control Panel so system commands to transmit resources cannot be entered until the system is unlocked.



Office of Information Technology

June 3, 2009

662 South President  
P O Box 2338  
Jackson, Mississippi 39225-2338  
Office: 601-973-8614 Fax: 601-960-8860

Jose Diaz  
Program Compliance  
USAC, Schools and Libraries Division  
Phone: 973-581-5141  
**471 Application 636392 FRN: 1761537**

The following information is the response to **Issue Number I** you presented in your letter concerning Funding Year 2008 FCC Form 471 Application 636392:

**QUESTIONS:** (a) What are these items? (b) How are they used? (c) And who uses them?

**(a) WHAT ARE THESE ITEMS?**

The system is a combination of hub, switches, and cables (which are eligible under e-rate rules as an internal connections solution). The 6 listed items are the required system components.

**(b) HOW ARE THEY USED?**

The system distributes telecommunications signals and Internet resources to user desktops from any point of access of the network or from any external source of information transmission such as telecommunications port, phone line, broadband connection, cable hook-up, or wireless transmission. The system also serves as an Internet line-sharing device.

**(c) WHO USES THEM?**

Lab technicians, network support personnel, and teachers/students use the system to access network and Internet resources.

In response to **Issue Number II**, I have decided to not submit a Block 5 for the un-posted service and I understand the current Form 471 Block 5 will be reduced by \$57,600.00.

Sincerely,

Daniel Littleton  
Erate Administrator



Schools and Libraries Division

May 27, 2009

Daniel Littleton  
Jackson Public School District  
Contact Phone Number: 601-973-8614 and 601-209-8053  
Application Number(s) **636392**

**Response Due Date: June 12, 2009**

As we discussed in our conversation, we are in the process of reviewing your appeal for your Funding Year 2008 FCC Form 471 Application numbers **636392**. To complete my review I need some additional information. The information needed to complete the PIA Review is listed below.

Issue I → see attachment

Based on the documentation that you have provided (Item 21 attachment) and additional documentation submitted during the appeal process (your e-mail received on 5/15/2009, FRN **1761537** includes a request for following items:

COMPONENT NAME	MODEL NUMBERS	QTY per SYSTEM	TOTAL QTY for 18 SYSTEMS	MANUFACTURER
Main System Controller	MCC-390TPS	1	1 x 18 = 18	COMWEB
Instructor System Control Panel	MCC-390KC	1	1 x 18 = 18	COWMEB
System Media Converter Controller	MDL-390VS	1	1 x 18 = 18	COMWEB
System Switch Box	MDL-295VPS	30	30 x 18 = 540	COMWEB
Desktop Switch Control Device	MDL-291VPS	30	30 x 18 = 540	COMWEB
Standard Cable Set	MCC-CABLE	30	30 x 18 = 540	COMWEB

However, we are not able to determine the eligibility of these items: Please provide a description of what these items are, how they are used, and who uses them.

Issue II

On your original FY2009 Form 471# **636392**, FRN **1761537** you indicated that Form 470 # 876370000660402 is the establishing Form 470 for the service requested in FRN **1761537**. This FRN is a mixed funding request for **Internal Connections and Basic Maintenance of Internal Connections**, but the referenced Form 470 did not post for **Basic Maintenance of Internal Connections**. This is a violation of the competitive bidding requirements of this program.

The establishing Form 470 is the specific Form 470, which was posted for that particular service for 28 days, and pursuant to which a contract was signed or an agreement was entered into. For a request in the Basic Maintenance service category that was filed prior to May 1, 2005, it is possible that the establishing 470 was filed under an Internal Connections service category. The establishing Form 470 could have been posted by the State, if the requested services are being purchased off of a State Master Contract.



Please verify if the referenced Form 470 is the establishing Form 470 for the multiple service categories listed above. Is this the establishing Form 470? X Yes or \_\_\_ No.

If **NO**, please provide the 15-digit Form 470 Number that did establish the bidding for this service. If the multiple service categories were posted on different Forms 470 then provide the 15-digit Form 470 Numbers that established the bidding for the respective services.

If **YES**, the charges associated with un-posted items must be identified and removed. The product(s)/service(s) will be placed in a new FRN.

According to program rules, USAC is unable to fund products or services which were not posted to an establishing Form 470. Listed below are the un-posted items:

**Basic System Maintenance (7/1/08-06/30/2009 including Warranty Support at \$57,600.00 per year or \$4800.00 per month.**

You must provide us with the information for the new FRN.

- Modify the current Form 471 Block 5 FRN information to remove the ineligible cost.
- Provide the Block 5 information for the original FRN (pre and post-split FRN). The post-split FRN will be a request for the amount for the original FRN with the ineligible cost removed.
- Complete Block 5 for the new FRN. The new FRN will be a request for the amount for the un-posted service.

Please complete the blank Form 471, Block 5 below. For additional instructions to fill out your Block 5 refer to Form 471 filing instructions at <http://www.usac.org/sl/tools/required-forms.aspx>.

Entity Number <u>128645</u>		Applicant's Form Identifier	
Contact Person <u>Daniel Littleton</u>		Phone Number	
<u>601-973-8614</u>			
<b>Block 5: Discount Funding Request(s)</b>			
Instructions: Use one Block 5 page for EACH service (Funding Request Number)			Block
5, page ___ of ___			
which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.			
10	<input checked="" type="checkbox"/> If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:		
11	Category of Service (only ONE category should be checked)	23	Calculations

<p><b>PRIORITY 1</b></p> <p><input type="checkbox"/> Telecommunications Service</p> <p><input type="checkbox"/> Internet Access</p>		<p><b>PRIORITY 2</b></p> <p><input checked="" type="checkbox"/> Internal Connections Other than Basic Maintenance</p> <p><input type="checkbox"/> Basic Maintenance of Internal Connections</p>	<p><b>Recurring Charges</b></p>	<p><b>A. Monthly charges (total amount per month for service)</b></p>
<p><b>12 Form 470 Application Number</b></p> <p>876370000660402</p>				<p><b>B. How much of the amount in A is ineligible?</b></p>
<p><b>13 SPIN - Service Provider Identification Number</b></p> <p>143005079</p>				<p><b>C. Eligible monthly pre-discount amount (A minus B)</b></p>
<p><b>14 Service Provider Name</b></p> <p>Comweb Technology Group, Inc</p>				<p><b>D. Number of months service provided in funding year</b></p>
				<p><b>E. Annual pre-discount amount for eligible recurring charges (C x D)</b></p>
<p><b>15a</b> <input type="checkbox"/> Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.</p>				<p><b>Non-Recurring Charges</b></p>
<p><b>15b Contract Number</b></p>		<p><b>F. Annual non-recurring charges</b></p> <p>\$572,400.00</p>		
<p><b>15c</b> <input type="checkbox"/> Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider).</p>				
<p><b>15d</b> <input type="checkbox"/> Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract.</p> <p>If so, provide that FRN here:</p>		<p><b>G. How much of the amount in F is ineligible?</b></p> <p>0</p>		
<p><b>16b</b> <input type="checkbox"/> Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.</p>				
<p><b>17 Allowable Vendor Selection/Contract Date</b></p>				<p><b>H. Annual eligible pre-discount amount for non-recurring charges (F minus G)</b></p> <p>\$572,400.00</p>

(mm/dd/yyyy) (based on Form 470 filing) 02/05/2008		
18	Contract Award Date (mm/dd/yyyy) 02/05/2008	Total Charges
19	Service Start Date (mm/dd/yyyy) 07/01/2008	
20a	Service End Date (mm/dd/yyyy)	
20b	Contract Expiration Date (mm/dd/yyyy) 06/30/2009	
		I. Total funding year pre-discount amount (E + H) \$572,400.00
		J. Discount from Block 4 Worksheet 88%
		K. Funding Commitment Request (I x J) \$503,712.00
21	Description of This Service:	Attachment
22	Entity/Entities Receiving This Service: Worksheet #1024563 ←	<p>a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service:</p> <p>b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):</p>

If you do not agree with our assessment that this FRN is a mix of different categories of services, then provide additional third party documentation (e.g. vendor bills, contract, service agreement, etc.).

If you do not respond within 15 days, the entire FRN will be denied.

Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested within 15 calendar days so we can complete our review. Failure to respond may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school has closed or will shortly close for summer break, let me know when you will be available to respond to these questions.

Please advise me if the Contact Person on the application(s) has changed from that on the original application. This change must include the Form 471 application number(s) and be signed by the original application's Contact Person, the original application's Authorized Person or a school official (with name and title provided).

Should you wish to cancel your Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Jose Diaz  
Program Compliance  
USAC, Schools and Libraries Division



Phone: 973-581-5141

Fax: 973-599-6525

E-mail: [jdiaz@sl.universalservice.org](mailto:jdiaz@sl.universalservice.org)

January 21, 2008

Mr. Gavin Guynes, Director  
Information Technology  
Jackson Public School District  
662 S. President Street  
Jackson, MS 39225



**COMWEB**

(601-960-8835 FAX 601-960-8860)

**RE: COMWEB Sole Source Letter**


Dear Mr. Guynes:

COMWEB Technology Group, Inc. of Totowa, NJ, is an education technology company dedicated to the development and marketing of innovative classroom technology.

This letter affirms that COMWEB Technology Group, Inc. is the sole proprietor of the COMWEB "KnowledgeWEB System" (KWS), a classroom network hub and switch. This means that COMWEB is the designer/manufacturer as well as the sole source supplier. COMWEB's KWS is unique in design, construction and functionality and COMWEB assumes full responsibility for performing all installation tasks (including technical training) as well as all warranty services. No other company in the United States is authorized to stock KWS replacement parts and components or to provide system technical support.

Mr. Guynes, please feel free to telephone or email either Randolph Rankin or me at any time with your questions. COMWEB looks forward to working with JPS on this important internal connections project.

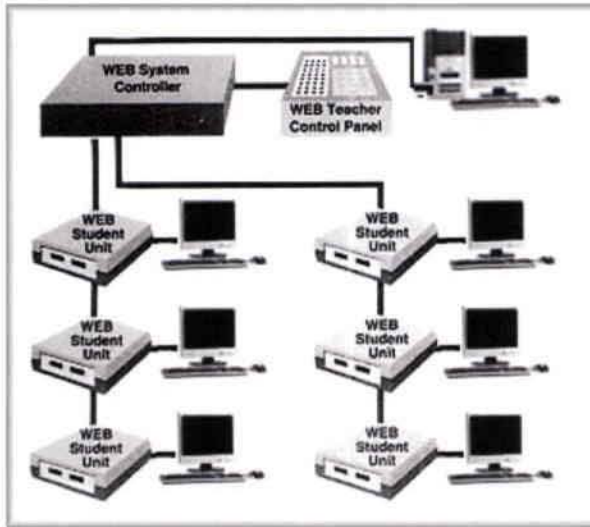
Sincerely,

  
James K. Chang  
President/Founder  
COMWEB Technology Group

cc: Randolph (Randy) Rankin/COMWEBVP-General Mgr & Product Director  
Anthony Davis/Education Technology Solutions (ETS) – Jackson, MS

A-4

## KnowledgeWEB System (for 21st Century Classrooms)



Received &amp; Inspected

AUG 18 2011

FCC Mail Room

The **KnowledgeWEB** will dramatically improve the teaching and learning environment in your classroom. Added to your existing hardware, the KnowledgeWEB lets you control the functions of all monitors, keyboards and mice. In general, a standard KnowledgeWEB system has two major components:

- **Teacher Control Panel** and its System Controller.
- **One Student Unit** for each student (monitor) computer, with connecting cables.  
along with several switching functional capabilities.
- Transmit whatever is on the teacher's monitor to all student monitors, a group of student monitors, or just one student monitor.
- Hand over remote control of your computer to any student's keyboard and mouse, allowing other students to watch on their screens if you wish.
- Take remote control of any student's (monitor) computer from your keyboard and mouse, allowing other students to watch on their screens if you wish.
- Automatically scan students' monitors from your computer-you choose the scan rate and the group of students to be scanned.

The KnowledgeWEB will dramatically improve the teaching and learning environment in your classroom.

### The KnowledgeWEB Types

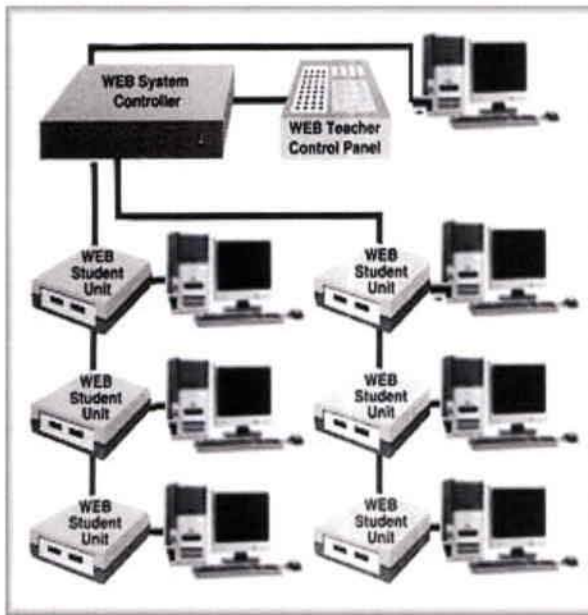
**Type-1:** One Teacher Station is daisy-chained with all other monitors on students' desktop through COMWEB teacher and students' control units (without any student's computer involved).

**Type-2:** One Teacher Station is daisy-chained with all other students' desktop computers of different kind (PC, MAC, Unix) through COMWEB teacher and students' control units.



**Type-3:** One Teacher Station is daisy-chained with all other students' desktop computers of same kinds (such as same PCs, same MACs or same Unixs) through COMWEB teacher and students' control units.

**Type-X:** Extension of type-2(3); two more different KnowledgeWEB classrooms connected either through COMWEB video-switching cable(s) or other way of digital remote connection ( such as wireless, satellite communication or digital (video) phone connection etc.).



## Benefits for The KnowledgeWEB

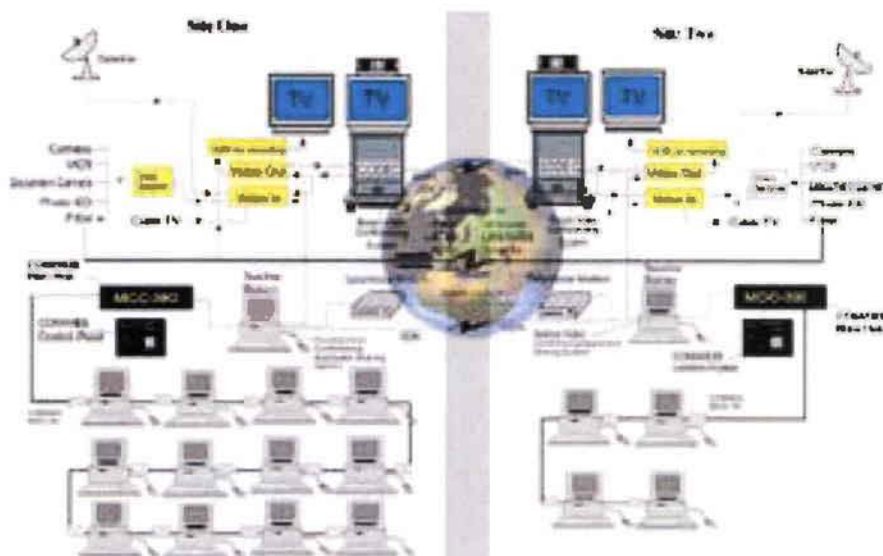
As a teacher, you will know how to use the standard **KnowledgeWEB**'s capabilities in a very short period of time.

- Let's say you're demonstrating some new software to your students. Using the **KnowledgeWEB**, you can take over control of all student systems. As you show students a feature of the software, they see everything clearly on their own screens. Their keyboards and mice remain inactive, so you'll have their undivided attention.
- Next, suppose you want students to try out a feature of the new software. With the **KnowledgeWEB**, you can move smoothly into skill-building by turning over remote control of your computer to individual students and allowing them to take over where you left off.
- As students take turns to try out the feature, the other students watch on their screens. You can take back control, demonstrate a technique, and turn over control to another student, all with a few touches on the teacher's control panel. Later in the class, while students are working individually on their (monitors) computers, you can scan their monitors unobtrusively on your screen.
- If you see a problem, you can take over remote control of the student's system to provide private help. Or, if it's likely to be a general problem, you can transmit the student's screen to all monitors and have the whole class work cooperatively on a solution. Similarly, if students come up with interesting work, you can let them show it to the whole class.

### Multi-Purpose Multi-Media 21st Century Learning Environment

COMWEB's advanced "KnowledgeWEB" (Enhanced Classroom Network Hub and Switch) is a system of internal connections that distributes telecommunications signals and Internet Resources to the teacher and student desktops from ANY point of access of the network or from any external source of information transmission. This is a modular, scaleable, dynamically re-configurable, and OPEN system. It is easy to learn, easy to operate, easy to maintain - with no built-in-obsolence. The goal here is to give teachers and students many new choices in terms of sources of content and styles of interaction:

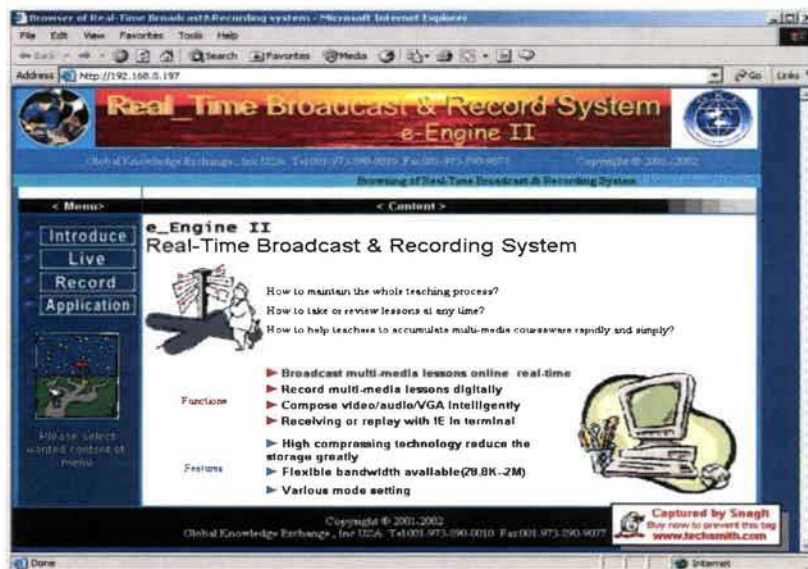
1. Instructor & Students Share Hi-Rez Screen Information in Real Time
2. 2-Way Keyboard and Mouse Control between Instructor and students
3. 2-Way Intercom between Instructor and Individual Students
4. Multi-Media Sound Distribution from any computer in the classroom
5. Instructor OR Student Work Displayed via Projector or Big Screen TV
6. Simple Student Desktop Interface - HELP Button for Signaling Teacher
7. All Computer Monitors Instantly Double as Real TVs
8. Screen Blanking + Option to Temporarily Exclude PCs from the System
9. Automatic Scanning of Student Screens - with Pause/Restart Button
10. System is compatible w/Telecommunications Ports, Phone lines, Broadband Connection, Cable Hook-up, or Wireless



### eZ-Engine : Add-On New KnowledgeWEB System

A MPEG4 Multi-Video Screen Broadcasting/Recording System Breakthrough Technology Captures the **Classroom in Action** Push-button CD Publishing Capability





## Some Applications of The KnowledgeWEB System

- The GLOBAL Learning Network - The Worldwide KnowledgeWEB System.
- The National Learning Network - A series of interconnected, interactive classroom structures.
- The Vocational Learning Network - Engineering, Medicine, Law and other special interest curriculum or industry groups.
- The Mathematics or Microbiology Learning Network - Other discipline specific groups.
- General Distance Learning/Remote Training Applications - Various AD HOC or special project groups.
- Multipurpose, Multifunction, Multimedia classroom designs - Information rich learning environments.
- More than 30 different kinds of computer lab.

## Options (Hardware products) for KnowledgeWEB System



**Electronic Chalkboard:** This video marker is an innovative component that allows users to draw and direct arrows or other pointers over any video or computer images as easily as you would use a pen using a digitizing tablet and an electronic pen. This tool is a visual aid for group discussion, allowing presenters to quickly and easily annotate areas of interest on monitors or displays used in boardrooms, classrooms, sports or weather broadcasts, videoconferences and more. Use the transparent (overlay) mode to write or draw over anything on your screen, or choose the solid background mode for a full-screen electronic chalkboard.



**Desktop Video Camera:** The ideal general purpose desktop video camera for your classroom. The lens is mounted on a rugged 3-axis articulated arm that rotates 180 degrees at the base and the camera head, and can be raised or lowered for endless applications from image capture to desktop, to portraits, presentations, videoconferencing, distance learning, and macro imaging. It can be used to display color video images of actual 3-dimensional objects, documents, photographs, slides and transparencies. It is designed to work with the



KnowledgeWEB's Video Input Unit.



**Document Video Camera:** This camera is designed to offer educators, medical technologists and business people high quality images for Distance Learning, Remote Diagnostic and 3-D Imaging, Desktop Publishing and Business Videoconferencing applications. It can view 3-dimensional objects, flat art, documents, photos, slides, transparencies and X-rays with exceptional clarity and sharpness. This camera has a high quality flexible lens with zoom control and a special platform to place objects or documents. All necessary controls are conveniently located on the front panel for ease of use. It is designed to work with the KnowledgeWEB's Video Input Unit.



**Communication Camera:** Whether your application is teleconferencing, remote monitoring, training or distance learning, this camera will enhance your communication needs by allowing audiences to see your point. The Camera Control Unit, used to position the camera head, can be detached from the camera so it freely operates in tight places. With an infinite number of pan and tilt positions, this camera offers even greater flexibility through its hand-held remote or PC-based Control Software, so you have complete camera position and zoom control right at your fingertips .